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U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Laredo National Bancshares Inc., et al., ) Case No. 1:00 CV 2081  
)  
Plaintiffs, ) Judge Lesley Brooks Wells  
) Magistrate Judge Nancy Vecchiarelli  
v. )  
) **Report of Parties' Planning**  
Donald E. Schulz, et al., ) **Meeting Under Fed. R. Civ. P. 26(f)**  
) **and LR 16.3(b)(3)**  
Defendants. )

1. Pursuant to Fed. R. Civ. P. 26(f) and L R 16. 3(b)(3), a meeting was held on November 27, 2000 and counsel participating were Patrick M. McLaughlin, counsel for plaintiffs and Philip J. Weaver, Jr., on behalf of defendant Schulz.

2. The parties:

\_\_\_\_\_ have not been required to make initial disclosures

XX have agreed to exchange the pre-discovery disclosures required by  
Fed. R. Civ. P. 26(a)(1) and the Court's prior order.

3. The parties recommend the following track:

\_\_\_\_\_ Expedited \_\_\_\_\_ Standard XX Complex

\_\_\_\_\_ Administrative \_\_\_\_\_ Mass Tort

ORIGINAL

4. This case is suitable for one or more of the following Alternative Dispute Resolution ("ADR") mechanisms:

\_\_\_\_ Early Neutral Evaluation    \_\_\_\_ Mediation    \_\_\_\_ Arbitration  
\_\_\_\_ Summary Jury trial    \_\_\_\_ Summary Bench Trial  
XX Case not suitable for ADR

5. The parties \_\_\_\_do / XX do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U. S. C. §636(c). [Note: One party is in favor of consenting, the other is not.]

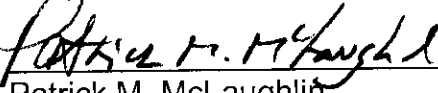
6. Recommended Discovery Plan:

- a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

Discovery will be sought on the creation, basis and dissemination of the NDIC White Tiger report and executive summary. Discovery will focus on Mr. Schultz and his interactions with NDIC personnel, his receipt of the White Tiger executive summary, and his alleged distribution of that summary. This discovery will require numerous depositions of the governmental employees involved with the creation of the White Tiger report and its executive summary, as well as the internal investigation of the dissemination of the White Tiger executive summary. Depositions of the various reporters who authored articles referencing the contents of the White Tiger executive summary will also be required. It is also anticipated that the parties will conduct discovery on the nature, extent, and amount of damages allegedly suffered as a result of the distribution of the White Tiger executive summary.

- b) Discovery cut-off date: September 30, 2001
7. Recommended dispositive motion date: October 30, 2001
8. Recommended cut-off date for amending the pleadings and/or adding additional parties: June 1, 2001
9. Recommended date for a Status Hearing: June 30, 2001
10. Other matters for the Court's attention: Motion to intervene as a non-party, filed by Walker F. Todd, is pending before the Court.

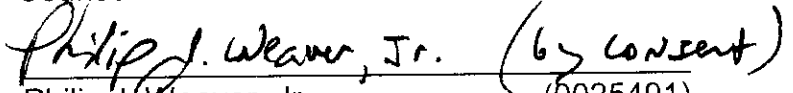
Respectfully Submitted,



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